

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>SEALED INFORMATION</u>
	:	
- v. -	:	
	:	S1 19 Cr. 375 (CS)
MARVIN WILLIAMS,	:	
	:	
Defendant.	:	
- - - - -	X	

COUNT ONE
**(Conspiracy to Transport, Receive, Possess,
and Sell Stolen Vehicles)**

The United States Attorney charges:

Background

1. Unless otherwise specified, at all times relevant to this Information, MARVIN WILLIAMS, the defendant, was a resident of Connecticut. WILLIAMS generated income by repairing cars for, and selling cars to, third parties.

2. From in or about 2017 through in or about November 2018, MARVIN WILLIAMS, the defendant, together with others known and unknown: (1) obtained stolen vehicles from, among other places, Michigan and Florida; (2) transported the stolen vehicles to, among other places, the Southern District of New York and Connecticut, for resale; (3) created and/or obtained false titles, registrations, and temporary license plates for stolen vehicles; (4) used the false vehicle records to deceive (a) buyers of the stolen vehicles, and/or (b) the South Dakota Department of Motor

Vehicles, among other places, to obtain new titles and registrations for the stolen vehicles; and (5) used online markets, among other things, to solicit purchasers of the stolen vehicles in various states.

3. MARVIN WILLIAMS, the defendant, and others known and unknown, obtained, transported, and sold or attempted to sell approximately sixty stolen vehicles worth, in total, approximately \$3,700,000.

Statutory Allegations

4. From at least in or about 2017 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, together with others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to (1) transport stolen motor vehicles, in violation of Title 18 United States Code, Section 2312, and (2) receive, possess, sell, and dispose of stolen motor vehicles, in violation of Title 18, United States Code, Section 2313.

5. It was a part and an object of the conspiracy that MARVIN WILLIAMS, the defendant, and others known and unknown, would and did transport in interstate commerce stolen motor vehicles, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2312.

6. It was a further part and an object of the conspiracy

that MARVIN WILLIAMS, the defendant, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of stolen motor vehicles, which had crossed a State boundary after being stolen, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2313.

OVERT ACTS

7. In furtherance of the conspiracy and to effect the illegal objects thereof, MARVIN WILLIAMS, the defendant, committed the following overt acts, in the Southern District of New York and elsewhere:

a. On or about July 3, 2018, WILLIAMS and a co-conspirator ("CC-1") exchanged a series of text messages regarding WILLIAMS potentially buying a stolen Corvette and a stolen Cadillac from CC-1.

b. On or about July 12, 2018, a co-conspirator ("CC-2") met the purchaser of a stolen black 2014 BMW 435i at the Westchester County Airport in White Plains, New York.

c. On or about July 19, 2018, WILLIAMS operated a stolen white Lamborghini Huracan in the Southern District of New York.

d. On or about September 9, 2018, WILLIAMS participated in a phone call with a co-conspirator ("CC-3") in which CC-3 agreed to look for a buyer for a stolen corvette that was in WILLIAMS's possession.

e. On or about September 14, 2018, a co-conspirator ("CC-4") sent WILLIAMS a package containing fake documents for stolen vehicles.

f. On or about September 19, 2018, WILLIAMS and a co-conspirator ("CC-5") participated in a phone call in which they discussed purchasing and selling a stolen Rolls Royce

g. On or about September 20, 2018, WILLIAMS participated in a phone call with a co-conspirator ("CC-6") in which they discussed WILLIAMS purchasing two stolen Land Rover Range Rovers from CC-6.

h. On or about October 15, 2018, WILLIAMS and a co-conspirator ("CC-7") exchanged a series of text messages in which they discussed WILLIAMS purchasing a fake title for a blue Dodge Charger Hellcat from CC-7.

i. On or about October 24, 2018, WILLIAMS and a co-conspirator ("CC-8") exchanged a series of text messages regarding a stolen Jeep Wrangler that CC-8 said had a manufacturer's retail price of \$72,000 but which CC-8 offered to sell to WILLIAMS for \$13,000.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The United States Attorney further charges:

Background

8. The allegations set forth in paragraphs 1 through 3 are repeated and realleged as if set forth fully herein.

9. MARVIN WILLIAMS, the defendant, and others known and unknown, engaged in a scheme to defraud car purchasers by misrepresenting, via text messages, phone calls, online advertisements, and other means, the origins, legal status, and identifying information of stolen vehicles.

10. MARVIN WILLIAMS, the defendant, and others known and unknown, falsely represented to the purchasers of certain cars that those cars were not stolen and had legitimate origins.

11. MARVIN WILLIAMS, the defendant, together with others known and unknown, provided false Vehicle Identification Numbers ("VINS"), titles, and bills of sale to the purchasers of certain cars.

Statutory Allegations

12. From in or about 2017 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, together with others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

13. It was a part and an object of the conspiracy that MARVIN WILLIAMS, the defendant, and other known and unknown, willfully and knowingly, having devised and intending to devise a scheme and

artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire in interstate commerce, writing, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Wire Fraud)

The United States Attorney further charges:

14. The allegations set forth in paragraphs 1 through 3 and 9 through 11 are repeated and realleged as if set forth fully herein.

15. From in or about 2017 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, did transmit and cause to be transmitted by means of wire in interstate commerce, writing, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, WILLIAMS received and attempted to receive wire transfers, and deposited cash and checks, via a bank account

located in the Southern District of New York and controlled by WILLIAMS, from purchasers of stolen vehicles to whom he had made false and misleading misrepresentations regarding the vehicles' origins, legal status, and identifying information, and aided and abetted the same.

(Title 18, United States Code, Sections 1343, 1349, and 2.)

COUNT FOUR
(Money Laundering)

The United States Attorney further charges:

16. From at least in or about November 2017 through in or about January 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly conduct and attempt to conduct such financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, to wit, WILLIAMS made wire transfers in amounts totaling approximately \$270,000 which involved the proceeds from the interstate transportation and sale of stolen motor vehicles.

(Title 18, United States Code, Section 1956(a)(1)(A)(i).)

COUNT FIVE
(Sale of Stolen Vehicles)

The United States Attorney further charges:

17. In or about December 2017, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, did receive, possess, conceal, store, barter, sell, and dispose of two stolen motor vehicles, which vehicles had crossed a State boundary after being stolen, knowing the vehicles to have been stolen, to wit, WILLIAMS sold a stolen blue 2017 Nissan Titan bearing a VIN ending in 9399 and a red 2017 Nissan Titan bearing a VIN ending in 4751, both of which had been transported from Florida, to individuals residing in the Southern District of New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT SIX
(Possession of a Stolen Vehicle)

The United States Attorney further charges:

18. From in or about May 2018 through in or about September 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicle to have been stolen, to wit, WILLIAMS possessed a stolen white 2016 Chevrolet Corvette bearing a VIN ending in 8750, which had been transported from Florida, in the vicinity of White Plains, New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT SEVEN
(Sale of a Stolen Vehicle)

The United States Attorney further charges:

19. In or about July 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicle to have been stolen, to wit, WILLIAMS, aided and abetted the sale of a stolen black 2014 BMW 435i bearing a VIN ending in 1110 to a purchaser who met with CC-1 in the Southern District of New York to conduct the purchase transaction.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT EIGHT
(Possession of a Stolen Vehicle)

The United States Attorney further charges:

20. From in or about July 2018 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicle to have been stolen, to wit, WILLIAMS possessed a stolen white Lamborghini Huracan bearing a

VIN ending in 0864, which had been transported from Florida, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT NINE
(Transportation of Stolen Vehicles)

The United States Attorney further charges:

21. From on or about September 21, 2018 through on or about September 22, 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, did transport in interstate commerce two stolen motor vehicles, knowing the vehicles to have been stolen, to wit, WILLIAMS transported a stolen black 2018 Land Rover Range Rover bearing a VIN ending in 7428, and a stolen black 2015 Land Rover Range Rover bearing a VIN ending in 8398, from Florida, through the Southern District of New York, to Connecticut, and aided and abetted the same.

(Title 18, United States Code, Sections 2312 and 2.)

COUNT TEN
(Sale of a Stolen Vehicle)

The United States Attorney further charges:

22. In or about October 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, and others known and unknown, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicle

to have been stolen, to wit, WILLIAMS sold a stolen blue 2018 Dodge Charger Hellcat bearing a VIN ending in 7036, which had been transported from Michigan, to an individual who resided in the Bronx, New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

**FORFEITURE ALLEGATIONS AS TO
COUNT ONE THROUGH THREE AND FIVE THROUGH TEN**

23. As a result of committing the offenses alleged in Counts One, Two, Three, Five, Six, Seven, Eight, Nine, and Ten of this Information, MARVIN WILLIAMS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

FORFEITURE ALLEGATIONS AS TO COUNT FOUR

24. As a result of committing the offense alleged in Count Four of this Information, MARVIN WILLIAMS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United

States currency representing the amount of property involved in said offense.


Substitute Assets Provision

25. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

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Defendant.

SEALED INFORMATION

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(18 U.S.C. §§ 371, 1343, 1349, 1956,
2312, 2313, and 2.)

GEOFFREY S. BERMAN
United States Attorney
